

JAP:JRL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

ALBALIS ALBA,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DANIEL REED, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 3, 2012, within the Eastern District of New York and elsewhere, defendant ALBALIS ALBA did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance, and a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about June 3, 2012, ALBALIS ALBA arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Jet Blue Flight 824 from Santo Domingo, Dominican Republic.

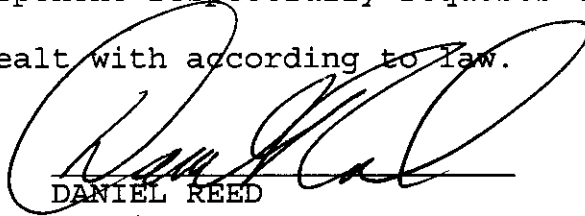
2. Defendant ALBALIS ALBA was selected for a Customs and Border Protection ("CBP") examination. Defendant ALBALIS ALBA presented a black suitcase for inspection. The CBP officer removed all clothing from the suitcase and felt the sides, which felt unusually thick. The CBP officer also noticed that the bag was unusually heavy when all clothing was removed. A probe of the bag revealed a white powdery substance which field-tested positive for the presence of cocaine. Defendant ALBALIS ALBA was placed under arrest. A total of three packages were extracted from the sides and bottom of the suitcase. The two packages concealed in the sides of the suitcase contained a substance which field-tested positive for cocaine. The package concealed in the bottom of the suitcase contained a substance which field-tested positive for heroin.

3. The total approximate gross weight of the two packages containing cocaine, which were concealed in the suitcase

¹Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

presented by ALBALIS ALBA, is 1040.8 grams. The total approximate gross weight for the package of heroin is 363.4 grams.

WHEREFORE, your deponent respectfully requests that defendant ALBALIS ALBA be dealt with according to law.



DANIEL REED
Special Agent, HSI

Sworn to before me this
4th day of June, 2012

GE